

EXHIBIT 3

Whitley, David

From: Whitley, David
Sent: Wednesday, May 07, 2014 4:40 PM
To: Freeman, Daniel (CRT) (Daniel.Freeman@usdoj.gov)
Cc: Scott, John; Clay, Reed; Bell-Platts, Meredith (CRT) (Meredith.Bell-Platts@usdoj.gov); Westfall, Elizabeth (CRT) (Elizabeth.Westfall@usdoj.gov); Berman, Robert (CRT) (Robert.Berman@usdoj.gov); Maranzano, Jennifer (CRT) (Jennifer.Maranzano@usdoj.gov)
Subject: Veasey v. Perry: HHSC Topics
Attachments: New Proposed HHSC Topics 05-07-14.pdf

Dan,

HHSC's designee is going to be prepared to discuss the attached topics on Friday. As highlighted in our objections just sent to all counsel, the topics sent in the original 30(b)(6) notice requested information about supporting identification not issued by HHSC. Supporting identification other than birth certificates have been removed in the attached list. Further, comments to proposed rules, along with the responses to the comments, are as equally available to HHSC as they are to plaintiffs. However, how HHSC arrived at those responses are covered by multiple privileges including deliberative process.

As opposed to unnecessarily burdening the court with a partial motion to quash, can we talk about coming to an agreement on the attached topics? If it works for you, we can make ourselves available tomorrow morning for a phone call.

Thanks,
David

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